

EXHIBIT E

Settlement Agreement

Remijas, et al. v. Neiman Marcus Group, LLC, Case No. 1:14-cv-01735 (N.D. Ill.)

The Honorable Samuel Der-Yeghiayan

EXHIBIT “E” TO SETTLEMENT AGREEMENT– PART 1

BANNER ADVERTIZEMENTS

Remijas, et al. v. Neiman Marcus Group, LLC
Case No. 1:14-cv-01735 (N.D. Ill.)

IF YOU USED A CREDIT CARD OR DEBIT CARD AT A **NEIMAN MARCUS GROUP*** STORE BETWEEN JULY 16, 2013 AND JANUARY 10, 2014,

you may be eligible to receive benefits from a class action settlement.

*INCLUDING NEIMAN MARCUS, BERGDORF GOODMAN, CUSP, AND LAST CALL STORES

[CLICK HERE](#)

for more information.

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EXHIBIT “E” TO SETTLEMENT AGREEMENT– PART 2

PRINT PUBLICATION NOTICE

Remijas, et al. v. Neiman Marcus Group, LLC
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LEGAL NOTICE

A federal court authorized this Notice. It is not a solicitation from a lawyer.

If You Used A Credit Or Debit Card At A Neiman Marcus Group Store Between July 16, 2013 And January 10, 2014, You May Be Eligible To Receive Benefits From A Class Action Settlement.

A proposed Settlement has been reached in a class action lawsuit involving Neiman Marcus Group, LLC ("Neiman Marcus"). You may be entitled to a payment of up to \$100. The Settlement resolves litigation over an alleged Cybersecurity Incident involving malware that was successfully inserted into Neiman Marcus's system by hacker(s). Malware means the malicious software that was capable of collecting credit or debit data from Neiman Marcus' computer system. The Parties have agreed to settle the Action in its entirety, without any admission of liability by Neiman Marcus. The case is known as *Hilary Remijas, Melissa Frank, Debbie Farnoush, and Joanne Kao v. The Neiman Marcus Group, LLC*, Case No. 1:14-CV-01735 (N.D. Ill.).

Who's included in the Settlement Class? The proposed Settlement Class includes all United States residents who held a credit or debit card account that was used in a Neiman Marcus Store at any time from July 16, 2013 to January 10, 2014. Neiman Marcus Store means stores at physical locations operating under the "Neiman Marcus", "Bergdorf Goodman", "Cusp", and "Last Call" names, but excluding all restaurants operating in any such stores, and excluding any website or online store.

What benefits does the Settlement provide? The Settlement provides for a Settlement Fund in the amount of up to \$1,600,000, to pay the Claims of Eligible Claimants, the costs to administer and give notice of the Settlement, taxes due on interest accrued on the Settlement Fund (if any), and any attorneys' fees and expenses and Class Representative Service Awards approved by the Court.

Each Eligible Claimant who submits a valid and timely Claim will receive a payment up to \$100. If the remaining amount is insufficient to pay all Eligible Claimants in full, the payments will be reduced on a *pro rata* basis. Eligible Claimants are the Settlement Class Members who held and used at least one credit or debit card at a Neiman Marcus Store between July 16, 2013 and October 30, 2013, on a date and at a time that the Malware was operating in that Store.

How do I receive Settlement benefits? In order to receive monetary benefits under this Settlement, Settlement Class Members should complete and submit a Claim Form to the Settlement Administrator. The deadline for submitting Claim Forms is **Month Day, 2017** if submitted online via the Settlement Website www.NMSettlement.com, or must be postmarked by

Month Day, 2017 if submitted by U.S. mail to the Settlement Administrator at: NM Settlement Administrator, 1801 Market Street, Suite 660, Philadelphia, PA 19103. Claim Forms can also be downloaded from www.NMSettlement.com, by calling toll-free 1-XXX-XXX-XXXX, emailing the Settlement Administrator at XXXXXX, or by mailing a request to the Settlement Administrator.

Who represents me? The Court appointed the law firms of Ahdoot & Wolfson, P.C. and Morgan & Morgan, as Class Counsel to represent the Settlement Class. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

Your options. If you are included in the Settlement Class and do not submit a Claim Form, your rights will be affected and you may not receive any benefits from this Settlement. If you do not want to be legally bound by the Settlement, you must exclude yourself from the Settlement by **Month Day, 2017**, by following the instructions in the detailed Long Form Notice available at www.NMSettlement.com or you won't be able to sue, or continue to sue, Neiman Marcus about the legal claims in this case. If you do not exclude yourself, you may object to the Settlement by submitting a written objection by **Month Day, 2017**, following the instructions in the detailed Long Form Notice available at www.NMSettlement.com. The Settlement Agreement and other documents relevant to this case are available at the settlement website, www.NMSettlement.com.

The Final Approval Hearing. The Court will hold a hearing on **Month Day, 2017, at XXXX a.m./p.m.** to consider whether to approve the Settlement, award Class Counsel Attorneys' Fees and Expenses up to \$530,000, and award the four Class Representatives up to \$2,500 each for their service. If approved, these amounts, will be deducted from the Settlement Fund. Please check www.NMSettlement.com for updates as the Court may continue the date of the hearing.

Want More Information? Call toll-free 1-XXX-XXX-XXXX, visit www.NMSettlement.com, or write to NM Settlement Administrator, 1801 Market Street, Suite 660, Philadelphia, PA 19103. PLEASE DO NOT CONTACT THE COURT.

Call Toll-Free 1-XXX-XXX-XXXX
www.NMSettlement.com

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